

Applicant(s): Cheng, et al.
Serial No.: 09/736,069
Filed: December 13, 2000
For: THE ARCHITECTURE OF A HAVi-WEB BRIDGE
Art Unit: 2154
Examiner: Patel, Ashokkumar B.

Attorney Docket No.: US 000045

REMARKS/ARGUMENTS

Reconsideration of the present application in view of the claims as set forth above and moreover in view of the following remarks is respectfully requested. Claims 1, 4, 8 and 11-15 are pending in the present application with claims 2, 3 and 5-7 having been previously canceled, and with claims 1, 8, 11 and 13 being amended hereby. No new matter has been introduced via the proposed changes and support for such changes can be found in the specification as originally filed. Neither has there been any new issue raised by such changes.

The Action rejected claims 1, 4, 8 and 11-15 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent Publication No. 2001/0047431 to Eytchison (hereinafter the “’431 reference”) in view of U.S. patent No. 6,523,696 to Saito et al. (hereinafter the “’696 patent”).

In response, Applicants first respectfully note that to establish a prima facie case of obviousness, the following criteria must be met: (1) There must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or to combine the teachings of the references; (2) There must be a reasonable expectation of success found in the prior art, not the applicant’s disclosure; and (3) The prior art references must teach or suggest all of the claim limitation(s). M.P.E.P. § 2142. Applicants also respectfully note that a “prior art reference must be considered in its entirety, i.e., as a whole, including portions that would lead away from the claimed invention.” M.P.E.P. § 2141.02, citing W.L. Gore & Assoc., Inc. v. Garlock, Inc., 721 F.2d 1540 (Fed. Cir. 1983), cert. denied, 496 U.S. 851 (1984).

With respect to item (1) above, Applicants respectfully submit that the ‘431 reference, as shown via Figs. 5 and 6 thereof, discloses/suggests two home networks (i.e., VHN network 502 w/IP capability and HAVi network 504) operatively associated via a single connection device (i.e.,

Applicant(s): Cheng, et al.
Serial No.: 09/736,069
Filed: December 13, 2000
For: THE ARCHITECTURE OF A HAVI-WEB BRIDGE
Art Unit: 2154
Examiner: Patel, Ashokkumar B.

Attorney Docket No.: US 000045

translator 506) connected to a single bus (i.e., an IEEE 1394 bus 508). In contrast, the '696 patent discloses/suggests two home networks operatively associated via two distinct connection devices (i.e., first AV connection device 204 and second AV connection device 205) each connected to a distinct corresponding bus (i.e., first IEEE 1394 bus 201 and a second IEEE 1394 bus 203).

In view of the foregoing, it seems apparent that the '696 patent, which reference reads on network connections requiring multiple buses to realize "a uniform service providing environment without relying on a particular network" ('696 patent, col. 3, lns. 1-2), does not address issues associated with network connections in which only one bus is used and which notably relies on a particular network (i.e., a VHN network) to provide or facilitate effective application/device interoperability. The reverse is also true. That is, the single bus/network-dependent network connection arrangement disclosed via the '431 reference does not address problems/issues associated with the dual-bus/network-independent network arrangement disclosed/suggested via the '696 patent.

Accordingly, considering each reference in its entirety, i.e., as a whole, as required (M.P.E.P. § 2141.02), it is respectfully submitted that, notwithstanding that which is asserted via the Action, there is no suggestion or motivation in either reference to modify the protocol translator 506 disclosed via the '431 reference as suggested via the Action as to do so would clearly be inconsistent with the teachings of the cited references. Why would one skilled in the art want to modify an efficient (fewer components) single bus/network-dependent network connection arrangement by adding components found in a dual-bus/network-independent network arrangement, especially given this dual-bus connection: *(i)* is less efficient (more components), and *(ii)* in effect, accomplishes only the same overall function (i.e., interconnect devices/applications associated with different networks), without further benefit? There is no reasonable basis for concluding that one of ordinary skill in the art would think to make such a combination. Accordingly, the cited references, despite that which is suggested via the Action, do not teach or suggest modifying the '431 reference in

Applicant(s): Cheng, et al.
Serial No.: 09/736,069
Filed: December 13, 2000
For: THE ARCHITECTURE OF A HAVI-WEB BRIDGE
Art Unit: 2154
Examiner: Patel, Ashokkumar B.

Attorney Docket No.: US 000045

view of the '696 patent, and thus it is respectfully submitted that at least for this reason, a *prima facie* case of obviousness has not been established.

With respect to item (2) above, Applicants respectfully submit, as demonstrated via the foregoing discussion, that the cited references effectively teach away from the suggested combination thereof. It follows then, that there would not be a reasonable expectation of success in modifying Eytchison's connection arrangement, with its single bus/network-dependent configuration, to include or incorporate any aspect of Saito et al.'s dual-bus/network-independent configuration.

Finally, with respect to item (3) above, Applicants respectfully submit that even if it were proper to modify Eytchison's network connection arrangement in the manner suggested via the Action in view of the '696 patent, which modification Appellants respectfully dispute, the resulting combination would not meet the terms of the present claimed invention. That is, the '431 reference, as acknowledged in the Action, fails to disclose or suggest at least: (i) an IP web client; (ii) a Non-IP Web server; (iii) a Web service executor, (iv) a Web page generator, and (v) a translation manager, as defined by the present claims. Furthermore, the '696 patent, which reference was cited to purportedly overcome the acknowledged shortcoming associated with the '431 reference, similarly fails to disclose or suggest at least the translation manager as defined by the present claims.

That is, the NAT processing unit 2206 of the '696 patent, as disclosed/suggested by Saito et al. and contrary to that which is suggested via the Action, does not read on a translation manager that is able to provide both service-to-user-interface and message-to-methods translation services, and further that is operatively directly connected to a Non-IP Web server, a Web service executor, and a Web page generator. Rather, Saito et al. specifically teach that the NAT processing unit 2206 is intended merely to provide "translation between the global IP address and the private IP address or between the IPv4 address and the IPv6 address in general". It follows then that there is no

Applicant(s): Cheng, et al.
Serial No.: 09/736,069
Filed: December 13, 2000
For: THE ARCHITECTURE OF A HAVI-WEB BRIDGE
Art Unit: 2154
Examiner: Patel, Ashokkumar B.

Attorney Docket No.: US 000045

teaching, suggestion or disclosure anywhere in the references of record to provide "a translation manager that is able to provide both service-to-user-interface and message-to-methods translation services, and that is operably coupled to a Non-IP Web server, a Web service executor, and a Web page generator. Accordingly, Applicants respectfully submit that as the cited art fails to disclose or suggest each and every element of Applicants claimed invention, the Action has clearly failed to establish a *prima facie* case of obviousness.

In sum, as the pending application, and more particularly the each claim hereof, is presently in condition for allowance, Applicants respectfully request that this amendment be entered and earnestly solicit that this application be passed to allowance.

Respectfully submitted,



David L. Barnes, Reg. No. 47,407
Attorney for Applicant(s)

PHILIPS INTELLECTUAL PROPERTY & STANDARDS
P.O. Box 3001
Briarcliff Manor, NY 10510
Tel: (914) 333-9693
Fax: (914) 332-0615
Email: dave.barnes@philips.com
www.ip.philips.com